

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ABRAM MULADZHANOV, BINYAMIN SCHWARTZ  
and GEORGE PRINGLE, individually, and on behalf of all  
others similarly situated,

Plaintiff,

-against-

**NOTICE OF MOTION**

18 CV 00930 (RRM/ST)

THE CITY OF NEW YORK, COMMISSIONER POLLY  
TROTTERBERG, in her individual and personal capacity,  
COMMISSIONER JACQUES JIHA, in his individual and  
personal capacity, DEPUTY COMMISSIONER JEFFREY  
SHEAR, in his individual and personal capacity, JOHN and  
JANE DOE CITY OF NEW YORK EMPLOYEES, JOHN  
and JANE DOE NEW YORK CITY DEPARTMENT OF  
TRANSPORTATION EMPLOYEES, JOHN and JANE  
DOE NEW YORK CITY DEPARTMENT OF FINANCE  
EMPLOYEES, JOHN and JANE DOE NEW YORK CITY  
PARKING VIOLATIONS BUREAU EMPLOYEES and  
JOHN and JANE DOE PARKING VIOLATIONS  
BUREAU ADMINISTRATIVE LAW JUDGES.

Defendants.

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**PLEASE TAKE NOTICE** that upon the annexed Declaration of Mark W. Muschenheim, dated April 26, 2019, and the exhibits attached thereto; the accompanying Memorandum of Law in support of this motion, dated April 26, 2019; and upon the pleadings herein, the undersigned will move this Court, before the Honorable Steven L. Tiscione, United States Magistrate Judge, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, at a time set by the Court, for an order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Amended Class Action Complaint, and granting such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that in the event that this motion is denied, in whole or in part, defendants respectfully request thirty (30) days from docketing of the order denying the motion in which to answer the Complaint.

Dated: New York, New York  
April 26, 2019

ZACHARY W. CARTER  
Corporation Counsel of  
the City of New York  
Attorney for Defendants  
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By:   
Mark W. Muschenheim  
Assistant Corporation Counsel

**By First Class Mail and E-mail**

Israel Klein, Esq.  
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